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Attorneys for Plaintiff Laura Fowler

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LAURA FOWLER,
Plaintiff,
v.
KINDRED HEALTHCARE
OPERATING, INC., a Delaware
Corporation; KINDRED HEALTHCARE
OPERATING, INC., a Delaware
Corporation doing business as CARE
CENTER OF ROSSMOOR; CARE
CENTER OF ROSSMOOR; a business
entity, form unknown; and Does 1 - 20,
Defendants.

Case No. CV 11-04600 EDL

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE
[N.D. Cal. L. R. 7-12; 16-2(e)]**

Magistrate Judge Elizabeth D. Laporte
Courtroom: E

1 Plaintiff LAURA FOWLER ("Plaintiff") and Defendants KINDRED HEALTHCARE
2 OPERATING, INC. and CARE CENTER OF ROSSMOOR, LLC DBA KINDRED
3 TRANSITIONAL CARE AND REHABILITATION - WALNUT CREEK ("Defendants"), by
4 and between their respective attorneys of record, hereby stipulate as follows:

5 1. Lead trial counsel, D. Gregory Valenza, Esq., is scheduled to begin a jury trial in
6 Sacramento County Superior Court on JANUARY 3, 2012. The trial already has commenced
7 (motions in limine have been decided, the courtroom is reserved, etc.), so this date is a firm trial
8 date.

9 2. This Court's Order Setting Initial Case Management Conference and ADR
10 Deadlines scheduled the Initial Case Management Conference on JANUARY 3, 2012.

11 3. The Standing Order re Case Management Conference of Courtroom E requires the
12 lead trial counsel to attend the case management conference.

13 4. A brief continuance of the Initial Case Management Conference to either
14 FEBRUARY 7 or 21, 2012 is necessary because lead trial counsel, D. Gregory Valenza, will not
15 be able to attend the scheduled case management conference as he is scheduled to begin trial on
16 the same date.

17 5. Pursuant to Local Rules 7-12 and 16-2(e), the parties agree to a continuance of the
18 Initial Case Management Conference to either FEBRUARY 7 or 21, 2012, or as soon thereafter
19 as compatible with this Court's case management calendar.

20 6. Pursuant to this Court's Order Setting Initial Case Management Conference and
21 ADR Deadlines, all other deadlines, including Initial Disclosures and Joint Case Management
22 Statement, will be continued accordingly.

1 SO STIPULATED:

2
3 Dated: December 7, 2011

Respectfully submitted,

4 SHAW VALENZA LLP

5 By: s/D. Gregory Valenza

6 D. Gregory Valenza

7 Amy K. Lee

Attorneys for Defendants

Kindred Healthcare Operating, Inc. and

8 Care Center of Rossmoor, LLC dba

Kindred Transitional Care and

9 Rehabilitation - Walnut Creek

10 Dated: December 7, 2011

Respectfully submitted,

11 LAW OFFICES OF JEREMY PASTERNAK

12 By: s/Anthony Oceguela

13 Jeremy Pasternak

14 Anthony Oceguela

Attorneys for Plaintiff

15 Laura Fowler

ORDER

Pursuant to the parties' Stipulation, and GOOD CAUSE APPEARING therefore:

IT IS HEREBY ORDERED that the Initial Case Management Conference in this matter be and is hereby CONTINUED to February 7, 2012, at 10:00 a.m.

IT IS FURTHER ORDERED that all deadlines, including those for Initial Disclosures and Joint Case Management Statement, are continued accordingly.

DATED: December 7 2011

